

Marine Management Organisation: Selecting the first areas for Marine Plans

Comments from
Wildlife and Countryside Link
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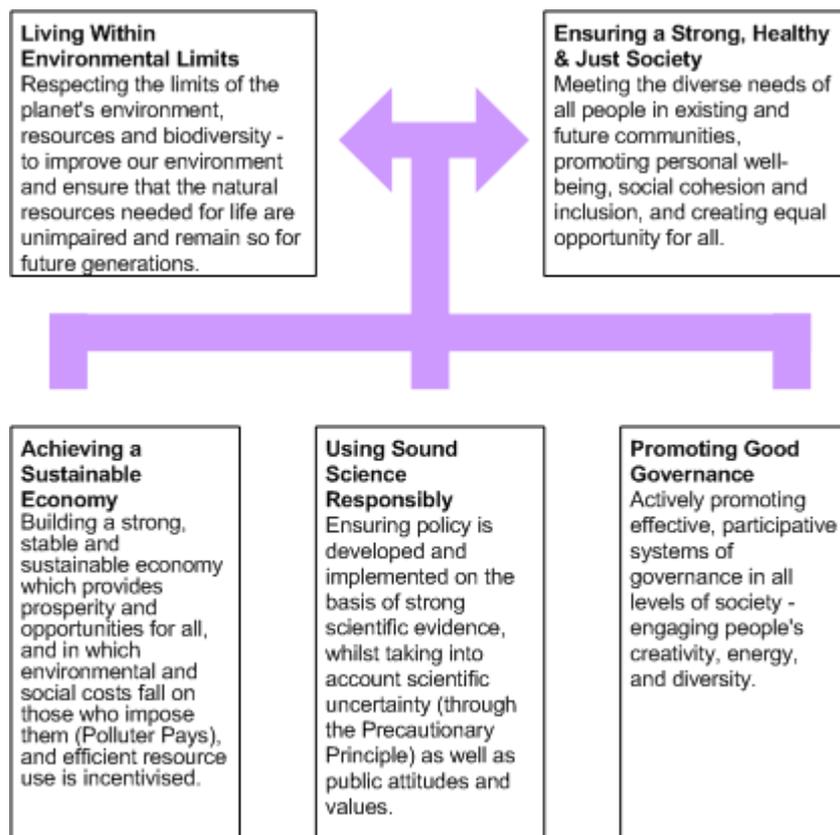
Introduction

Wildlife and Countryside Link (Link) brings together the UK's leading voluntary organisations united by their common interest in the conservation and enjoyment of wildlife, the countryside and the marine environment. Taken together our members have the support of over 8 million people in the UK.

Sustainable Development

In light of the overriding principle being the contribution that marine plans can make to sustainable development (SD) and in response to some of the comments highlighted in the summary of responses, we would suggest that greater clarity with respect to what the MMO means by SD is needed.

Link would strongly urge the MMO to reiterate the five principles of SD as set out in the UK Sustainable Development Strategy (UKSDS), *Securing the Future* (2005). Therefore, we strongly believe that principles of SD must be set out and used as follows:



These principles form the basis for policy in the UK. The UKSDS goes on to state that: "We want to achieve our goals of living within environmental limits and a just society, and we will do it by means of a sustainable economy, good governance, and sound science." *

- * i.e. while all five principles must be respected in developing sustainable policies, it is clear from the diagram that to achieve sustainable development the priority is to achieve the principles of living within environmental limits and attaining a just society. Therefore, we believe that the five principles must be presented in this format at all times.

The same hierarchy then also applies to the joint UK High Level Marine Objectives, which provide the context for the five SD principles in the marine area.

Link believes that the existence of this hierarchy and an acknowledgement that “*living within environmental limits*” and “*ensuring a strong, healthy and just society*” are essential factors in achieving SD in the marine area. Consequently, we are concerned that with increasing regularity, the hierarchical format of the SD principles is being ignored or sidelined.

To highlight the point, we refer to the conclusions of *Charting Progress 2* (Defra, 2010). CP2 shows that we are already in a situation where we are not achieving SD in the marine area. The UK’s seas and its resources are already being used unsustainably and we know that there is ongoing loss of and damage to marine biodiversity and against this worrying environmental assessment, there is increasing demand for marine space and resources. Thus making the future delivery of SD in the marine area more difficult.

First Areas for Marine Plans

1. Inshore vs. Offshore Plan areas

In determining which two areas should be planned for first, Link’s overriding view is that the inshore-offshore boundary must not create an artificial division within regional seas. Therefore, whatever areas are chosen to plan for first should be adjoining inshore and offshore plan areas.

These adjoining inshore and offshore plans should be produced jointly so it appears as if one plan is being produced. Such an approach would reduce duplication of effort for both stakeholders and planners and ensure a joined up approach to planning between the offshore plan, the inshore plan and the land-sea interface. Producing inshore and offshore plans in parallel would also reduce the number of planning processes required to cover all English waters to 6.

2. Priority Plan Areas – suggestions

The following suggestions are presented in order of preference.

(i) South West Inshore and Offshore plans

- Resolve considerable sustainability challenge by a wider locational planning approach for a number of difficult issues, for example, tidal power generation, other marine renewables, shipping and ports, nature conservation, aggregates extraction, fishing, tourism, MOD, etc.
- Address notable governance / process difficulties, via comprehensive range of stakeholder engagement mechanisms (individual estuary partnerships, Devon Maritime Forum, Finding Sanctuary stakeholder project).
- Would demonstrate need for cross-border collaboration with the Welsh Assembly Government in the Severn Estuary and the Bristol Channel.
- Advanced stage of Finding Sanctuary compared to other MCZ regional projects.
- Covers the English part of the Western English Channel and Celtic Sea biogeographic regional sea.

(ii) *East Inshore and Offshore plans*

- Complexity of issues needing resolution in the near future – cSAC, Round 3 offshore wind farm zone, fishing.
- Demonstration for other plan areas with existing conflicts.
- Busy area of transnational sea, useful for identifying transboundary Member State collaboration for marine planning, e.g. project proposals under the European Commission's "Preparatory Action on Maritime Spatial Planning in the North East Atlantic, North Sea, Channel Area" funding stream.
- WWF Germany North Sea report examining marine reserves.
- Covers the majority of the southern North Sea biogeographic regional sea.

(iii) *North East Inshore and Offshore plans*

- Covers complex issues such as major ports, including Teesport, a range of offshore industries, and many stakeholder activities, including some of the most productive fishing grounds around England.
- A range of coastal protected areas including AONBs, seabird breeding colony SPAs, etc.
- Demonstration for cross-border issues with Scotland, including building on existing joint management plan for Northumberland AONB and EMS (up to St Abbs), which includes cross-border co-operation.
- Demonstration of transboundary issues with other EU Member States.
- Covers the English part of the northern North Sea biogeographic regional sea.

iv) *North West Inshore and Offshore plans*

We realise this is one plan area; therefore we are proposing it on its own as it has a number of benefits:

- Demonstration of cross-border issues with Scotland and Wales.
- Complexity of issues needing resolution in the near future – including the most sustainable option(s) for tidal power generation, and Round 3 offshore wind in the context of wider planning approach.
- Pilot study to work from.
- Existing evidence base.
- Demonstration of the benefits of planning inshore and offshore regions together.
- Spatially more constrained than other areas.

Annex 1: The Link response to the Defra consultation on – “Marine Plan Areas within the English Inshore & English Offshore Marine Regions”, February 2010.

For information, we include here our original responses to Questions 6 to 9 of the original marine plan areas consultation as our points do not appear to have made any significant difference to the redrafted criteria in Defra’s “Consultation on a marine planning system for England”, July 2010.

Question 6: Do you agree that these considerations should inform decisions on the order in which marine plans should be prepared?

Link agrees that these considerations should inform the decisions on the order in which the marine plans should be prepared. However, we would reiterate the point we made in response to Q5, that where existing coastal forums or informal plans are used, that the MMO is satisfied that all relevant stakeholders were involved and adequately represented and that minimum consultation and scrutiny requirements are met.

Question 7: Are there any other considerations which you feel are relevant to the order in which plans are prepared, and why?

We believe there are additional considerations that should be taken into account when determining the order in which plans should be prepared. These include the timing, duration and intensity of other stakeholder engagement processes, particularly those linked to the implementation of other parts of the Marine & Coastal Access Act 2009. The Act is generating a considerable amount of work for stakeholders with marine and/or coastal interests. While Link strongly welcomes and supports stakeholder engagement, in developing marine plans, the MMO must consider the other pressures and constraints on stakeholders’ time and resources, particularly over the next few years when the implementation of the Act’s provisions will be at their most intense.

In particular, we urge the MMO to consider the timetable and workload of stakeholders who are involved in the four regional MPA network projects in England. S5.3.4 (pg:38) highlights the likely conflict of timing and workload between these two important elements of the implementation of the Act. The proposal for marine planning in the initial two areas to start shortly before the publication of the four regional MPA projects report to the Minister will significantly add to the workload of those stakeholders, including LAs, EA and other interested parties, who wish to be involved in both processes. This is likely to be incompatible with the consideration of ‘preparedness of area’ (s5.3.8, pg.39), i.e. readiness and availability of stakeholders (organisations and individuals) to participate.

We are not suggesting delaying the preparation of marine plans. However, this is a very relevant and important consideration.

In determining the marine planning work programme, it would be useful for the MMO to have a deadline for completion of the full suite of plans, as well as the order of marine plan preparation and milestones towards achieving full plan coverage for English waters.

Question 8: Do you agree with these considerations and their classification? If not, how would you classify them, and why?

And

Question 9: If you suggested any changes to the considerations in response to Questions 6 & 7, how do you think they should be reflected in this table?

We suggest the following changes to the classification of considerations presented in the table in section 5.5. These are as a result of our comments in response to Q6 & Q7, but we also suggest additional changes.

- In the primary considerations box, we would specifically add references to the UK's marine vision and the high level marine objectives (HLMOs) to the statement on the "*contribution to... Government policy*".
- Make the following additions to the primary considerations box:
 - Presence of existing conflicts
 - Environmental importance, sensitivity or vulnerability of an area
- Move the statement "Integrating management of border areas (including at the coast and across UK internal and international borders)" from the primary into the secondary considerations box. While integration at borders and boundaries is an important outcome to achieve, it should not be one of the primary reasons in determining the order of plan preparation.
- In the secondary considerations box, expand on the "*preparedness of area*" statement by adding "*... in particularly aiming to avoid overlap with other marine implementation processes that also require high levels of stakeholder time and resources*"

This response is supported by the following organisations:

- Marine Conservation Society
- Royal Society for the Protection of Birds
- The Wildlife Trusts
- WWF – UK



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